

# **EXHIBIT A**

Original Exhibit to Jordan's Response  
Letter to Trustee dated 10/16/2024.



Joshua Jordan <josh@prehired.io>

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**Fwd: PreHired**

3 messages

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**Joseph C. Barsalona II** <JBarsalona@pashmanstein.com>

Wed, Nov 23, 2022 at 4:48 PM

To: Joshua Jordan <josh@prehired.io>, prehired <prehired@warren.law>

Cc: "Richard C. Solow" <rsolow@pashmanstein.com>

Josh, See below from the chapter 7 trustee regarding cessation of the business. I trust this is not happening, but wanted to forward on in any case.

Josh and Warren Team, see the below request to set up a call with the trustee and his counsel next week. I will provide your contact information to him so that you can have separate discussions if you like.

Have a Happy Thanksgiving and let's touch base next week. Thanks.

**Joseph C. Barsalona II**

Partner

Pashman Stein Walder Hayden,

P.C.

302.592.6497 Direct

201.788.9045 Cell

[jbarsalona@pashmanstein.com](mailto:jbarsalona@pashmanstein.com)

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**Joseph C. Barsalona II**

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**From:** Beskrone, Don A. <DBeskrone@ashbygeddes.com>

**Sent:** Wednesday, November 23, 2022 4:43:05 PM

**To:** Joseph C. Barsalona II <JBarsalona@pashmanstein.com>

**Cc:** Palacio, Rick <RPalacio@ashbygeddes.com>; Kristy M. Jones (dbeskronetrustee.asst@gmail.com) <dbeskronetrustee.asst@gmail.com>

**Subject:** Re: PreHired

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**EXTERNAL:** This email originated from outside of the organization.

Joe, following up on our call, I am advised by counsel for certain parties in interest that, notwithstanding the conversion of the case to chapter 7 yesterday, the Debtors' former principal, Mr. Jordan, is continuing to operate the business and hold himself out as having authority to act on behalf of the Debtors. Please advise Mr. Jordan to immediately cease any activity with respect to the Debtors. I will make demand for turnover of funds from banks and other persons or entities holding funds of the Debtors directly to them. Please forward the Debtors' last 3 federal tax returns and access credentials to the Debtors' accounting system as soon as practicable. If possible, I would like to schedule a call for Monday or Tuesday afternoon with you, Mr. Jordan and his counsel to discuss matters relevant to my administration of these cases. I'll reach out on Monday regarding proposed times. Thanks.

Don

Sent from my iPhone

On Nov 22, 2022, at 5:58 PM, Joseph C. Barsalona II <JBarsalona@pashmanstein.com> wrote:

Hi Don,

Let's chat tomorrow. I just got to MA after an 8 hour car ride with the family. There are no pending emergencies. Will follow up on a 401k but I do not believe there is one.

Thanks,

Joe

**Joseph C. Barsalona II**

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**From:** Beskrone, Don A. <DBeskrone@ashbygeddes.com>  
**Sent:** Tuesday, November 22, 2022 4:42:08 PM  
**To:** Joseph C. Barsalona II <JBarsalona@pashmanstein.com>  
**Cc:** Palacio, Rick <RPalacio@ashbygeddes.com>; Kristy M. Jones (dbeskronetrustee.asst@gmail.com) <dbeskronetrustee.asst@gmail.com>; Kristy M. Jones (dbeskronetrustee.asst@gmail.com) <dbeskronetrustee.asst@gmail.com>  
**Subject:** PreHired

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| <b>EXTERNAL:</b> This email originated from outside of the organization. |
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Joe, I was just appointed chapter 7 trustee in the PreHired cases. Please give me a call at your earliest convenience at 302 504 3708 (direct work line) or 302 388 0223 (cell). Please advise whether the Debtors have a 401k or other ERISA benefits plan and, if so, the contact information for the third party administrator or other person/entity in control of the plan. Please advise me asap of any other matters requiring immediate attention. Thank you.-

Don

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**Joshua Jordan** <josh@prehired.io>  
To: "Joseph C. Barsalona II" <JBarsalona@pashmanstein.com>  
Cc: prehired <prehired@warren.law>, "Richard C. Solow" <rsolow@pashmanstein.com>

Wed, Nov 23, 2022 at 4:52 PM

This is not happening. I have not done anything in the business since we filed the 7 motion